Coast Guard

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**COMDTINST 16471.2** 

#### **COMMANDANT INSTRUCTION 16471.2**

#### Subj INCIDENT COMMAND SYSTEM IMPLEMENTATION PLAN

Ref (a) Incident Command System, COMDTINST 16471.1

- PURPOSE. This Instruction outlines the general training and qualification strategy for the implementation of the National Interagency Incident Management System (NIIMS) Incident Command System (ICS). The adoption of NIIMS ICS as the Coast Guard's doctrine for response management is discussed in reference (a). The implementation of ICS using the NIIMS National Training Curriculum will provide responders the solid foundation in response management skills needed to improve the Coast Guard's ability to effectively respond to a variety of non-military incidents such as floods, hurricanes, oil spills and hazardous substance releases. Numerous studies of actual responses and exercises have identified several areas in which the nation's ability to respondeffectively and efficiently can be significantly enhanced. One of the most expedient and cost effective areas for improvement is response organization and management.
- 2. <u>ACTION</u>. Area and District Commanders, Commanding Officers of Marine Safety Offices, Groups, Activities, and Strike Teams shall comply with the requirements of this instruction and ensure that all personnel involved in response actions are familiar with, and trained in, the use of NIIMS ICS.
- 3 <u>DIRECTIVES AFFECTED</u>. This Instruction augments the guidance in reference (a).
- 4 <u>BACKGROUND</u>. Many post-spill response studies such as COMDTNOTE 16465 of 13 Jul 94, Pollution Incident Review (PIR) of the Tampa Oil Spill, and COMDTNOTE 16465 of 07 Oct 94, Incident Specific Preparedness Review (ISPR) Final Report for the MORRIS J. BERMAN Oil Spill, have recommended the adoption of a standardized response management system and the

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development of a response management training program. In addition to these post-response studies, the Coast Guard's Spill of National Significance (SONS) Task Force of 1993 and the Response Management Task Group (RMTG) of 1994 came to the same conclusion. They recommended to the Commandant that the Coast Guard adopt a standardized response management system and a proactive training program to implement such a management system. As a result of these recommendations, reference (a) was promulgated.

NIIMS ICS, through the use of the National Training Curriculum, provides essential training in the response management tools and processes needed to improve the nation's ability to respond. In addition, ICS provides the Federal On Scene Coordinator (FOSC) a system that is easily adaptable to existing corporate organizational structures, and serves as a medium to enhance cooperative efforts during a response.

ICS is a long-standing system that has been proven to be an "All Hazard-All Risk" systems approach to managing crisis response operations and non-crisis events. It is stressed that ICS can and should be used for all sizes and kinds of incidents or events. While ICS provides the greatest benefit with regard to the low probability, high consequence response, gains in efficiency and effectiveness are achievable for all responses and planned events as well. It is imperative that field units become accustomed to ICS through regular use in order to be proficient in its use during the larger, infrequent incidents.

The use of ICS as the standard response management system is beneficial in other ways. A key advantage to the ICS training portion of the NIIMS system is that it is prepackaged, low cost, and ready to use. All materials are public domain and can be shared with other members within the response community. The training materials can be easily adapted for Coast Guard programs. In addition, the adoption of the National Training Curriculum allows members of the response community to know what kind of organizational structure the Coast Guard will use regardless of the location within the country.

Enclosed is the implementation plan outlining how the Coast Guard will incorporate ICS as its response management structure. Additionally, it introduces the concept of Incident Management Teams (IMTs) to the Coast Guard. These teams will be available to OSCs to ease the overwhelming overhead associated with response management by bringing in trained, experienced personnel to assist with the organizational management necessary for a successful,

efficient response. The makeup of these teams will be drawn from MSOs, Groups, Air Stations, NSF assets, and staff personnel. Their presence will support the local command and allow the relationships and strategies formed during the Area Committee and other planning processes to be put into place.

The purpose of this instruction is to highlight the proposed training requirements, make known the availability of ICS training, and to state the importance of the role ICS will play in the Coast Guard's response management organization. The issues addressed here play a vital role in the planned organization for Spills of National Significance (SONS). Appendices will be developed that will further detail IMTs,Incident Support Teams, and ICS qualifications.

ICS represents the future of non-military incident management. The Marine Safety and Environmental Protection Program is coordinating with other programs to devise a common management organization for all contingencies. All Commanding Officers and command leadership should learn and implement the Incident Command System. We have an excellent opportunity to strengthen our efficiency in incident management.

5 <u>PROCEDURE</u>. Commandant (G-MOR) shall oversee the implementation of ICS throughout the Marine Safety Program. All Marine Safety personnel should actively pursue the applicable training outlined in this instruction. Unit Commanding Officers shall ensure that all of their personnel are familiar with this instruction. It should be emphasized that this instruction describes major program changes that will not be achieved overnight. However, units should not delay in progressing toward the ultimate goal of using ICS as our standard response management system.

/s/ R.C. NORTH Rear Admiral, U.S. Coast Guard Assistant Commandant for Marine Safety and Environmental Protection

Encl: (1) ICS Implementation Plan

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#### CHAPTER 1. ICS IMPLEMENTATION PLAN

#### 1 Discussion.

As with any new system, it will take time for personnel to become trained and proficient in the use of ICS. However, it is also recognized that Coast Guard response personnel need to be trained in ICS as soon as possible in order to ensure the highest response capability. The implementation of ICS in the Coast Guard will have two dimensions to accommodate both long and short term needs. The first dimension is the aggressive, proactive training program, for Coast Guard personnel, to develop a sound baseline of ICS knowledge and proficiency. The second dimension is the development of a productive, systematic and institutionalized program for ICS training and qualification.

## 2 <u>ICS Implementation Team (IIT)</u>.

Commandant has assembled and coordinates an ICS Implementation Team to accomplish the above ICS implementation goals. The IIT works directly for Commandant (G-MOR), the Headquarters program manager, in refining, finalizing and carrying out the implementation of ICS within marine safety. The IIT does not involve dedicated billets, but relies on the use of Existing personnel serving in a TAD capacity. The composition of the ICS Implementation Team includes members from G-MOR, G-O, RTC, NSF, R&D Center, District staffs and Marine Safety Offices.

## 3 <u>Incident Typing and Incident Management Teams</u>.

Certain ICS concepts have a direct bearing on the ICS Training Program. There are two key concepts within ICS that are necessary to understand in the context of this instruction. They are the features of Incident Typing and Incident Management Teams.

a Incident Typing. A basic characteristic of NIIMS ICS is modular organization. The size and depth of the organization is built for the particular incident based on the needs of that incident. As a result, within the NIIMS ICS system, incidents are classified (or "typed") based on the size and complexity of the response, not the amount of product spilled. Spill classes designated by the National Contingency Plan remain for administrative and

planning purposes. Incidents are classified as Type 1, 2, 3, or 4, where the Type 1 incident is the largest and most complex and brings with it a greatly increased number of responders as well as a significant diversity of goals. A table which outlines the characteristics of each Type incident and gives examples of each, is included as Appendix A. It is important to understand this feature of ICS in the context of this instruction because the level of ICS training a person will need depends on the Type of incidents to which that person will be expected to respond. MSOs and COTPs are expected to respond to the Type 3 and Type 4 incidents, staffing the appropriate ICS organization with unit personnel, Area Committee members, and perhaps some District and NSF resources to fill the gaps. For more complex incidents, the local MSO/COTP may call upon an Incident Management Team for assistance.

b Incident Management Team Concept. Recognizing that it is neither realistic nor cost-effective to maintain a high level of expertise for each individual within a response community, NIIMS ICS provides for Type 1 and 2 Teams, which the Coast Guard refers to as an Incident Management Team (IMT). These are groups of trained and experienced personnel who train and deploy as a team to augment the local response organization. It should be clearly understood that IMTs are intended to assist the FOSC, not supersede or preempt the FOSC or local response management personnel. In the Area Committee planning process, FOSCs should identify possible shortfalls in their ICS response management structure where IMTs could assist. FOSCs may choose all or part of the IMT to best suit the needs of the response. The composition of a Regional IMT is depicted in Appendix B.

Full implementation of ICS will include establishing three Regional IMTs, one corresponding to each Strike Team area of responsibility. These Regional IMTs will support the response to regionally significant incidents/spills (Type2). Over the long term, Areas and Districts will establish District IMTs to assist primarily with Type 3 responses. Members may serve on more than one IMT and resources from Regional or District IMTs will be used to staff a National (Type 1) IMT. The specifics of IMT development and administration is described in Appendix B.

Use of the IMT concept attempts to greatly reduce the training requirements necessary to implement and maintain an effective ICS response capability at the unit level. Individual responders will not be required or expected to

- obtain all of the available ICS training. Rather, local responders will be trained to the level determined necessary to meet unit needs. IMT members will receive more advanced instruction.
- c Incident Support Teams (IST) will provide support to a particular function. The concept of Incident Support Teams is discussed in Appendix C. FOSCs should realize that on larger and more complex incidents the use of IMTs and Incident Support Teams will help to ease the overwhelming burden of response management on the local unit thereby allowing local personnel to develop and execute response strategy, priorities and objectives.
- 4 <u>ICS Training Program Elements</u>. The ICS Training Program consists of general NIIMS ICS courses, position-specific courses, position-specific workshops, and sub-team training.
  - a General ICS Courses. The NIIMS ICS-National training Curriculum is divided into four series of instruction, I-100, I-200, I-300, and I-400. This category of the training program focuses on the methodical timed-phased presentation of the materials contained in the seventeen National Training Curriculum series (see Appendix D). These four series of instruction serve as the core curriculum of the training program.
  - b Position-Specific Courses. NIIMS ICS contains position- specific courses for key positions within the ICS organization, such as Operations Section Chief, Planning Section Chief, etc. These are higher-level courses, designed to teach detailed responsibilities of the position and how to perform these responsibilities within the organization. Position-Specific Workshops. Because of the limited availability of existing Position-Specific courses, position-specific workshops will be held. These will be geared toward field unit and District personnel and will emphasize the Coast Guard aspect of carrying out the responsibilities of an ICS position, as well as information flow within the ICS organization. The workshops will consolidate information from two or more position-specific courses.
  - c Sub-Team Training. This category of training includes small group or team dynamics and is designed to help the

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people who work together within an ICS organization to be a productive, efficient unit. This training is an essential component of the ICS training program in addition to the individual training described above.

- 5 <u>ICS Training Program Implementation</u>. The following outlines the vision for the ICS training implementation, including target audience and delivery sources for the various elements. It is summarized in a table at the end of this section and in Appendix E. As explained below, responsibilities for providing or conducting various ICS training elements will change in order to create the institutionalized, self-sustaining ICS training program envisioned.
  - a I-100. Within the National Training Curriculum is a training module entitled "ICS Orientation: Module 1, I- 100." This portion of the overall training program is to be administered by the Coast Guard Institute as a correspondence course. This course is required for all Coast Guard active duty and reserve response personnel. I-100 will be a prerequisite for additional ICS training. A copy of the End-of-Course letter is to be included in the member's training record.
  - b I-200. The ICS modules that constitute the I-200 block of training will be required for all field unit personnel including Reserve personnel. Incident Support Teams will be staffed by personnel with this level of training as a minimum. This training is available as a one-day course given by the Strike Teams as part of the annual MSO field unit training program. The I-200 modules will also be built into the core curriculum marine safety courses. The future of I-200 is the development of a facilitated correspondence course to be delivered at the unit level by a facilitator who is experienced and trained to the I-300 level. Reserve members of field units would be an appropriate source for this facilitator position.
  - c I-300. The I-300 block of instruction is required for all field unit personnel in leadership roles or as determined by their Commanding Officer. In addition, it is required for all personnel who will fill the position of Task Force Leader or above in the Operations Section, or the Unit Leader or above positions in the other ICS Sections. Commanding Officers are responsible for developing their local ICS organization, including the identification of personnel to potentially fill appropriate positions. From

this, unit Commanding Officers are to determine who within their unit or Area Committee needs to receive I-300 beyond the requirements set above

This course will initially be provided to each field unit by the National Strike Force. There will also be I-300 training given at RTC Yorktown as part of the Chief, Port Operations Department (CPOD) course, as well as one or more of the Contingency Preparedness courses. Lastly, I- 300 may be obtained through commercial sources. Units that wish to contract out such training must coordinate with the NSFCC to ensure the training meets the NIIMS ICS and Coast Guard standards for ICS training.

- d Position-Specific Courses. Based on their limited availability, IMT members will receive priority to attend these courses. Current providers include the National Interagency Fire Center (NIFC) in Boise, Idaho, or the California Department of Forestry.
- e Position-Specific Workshops. These training events are geared toward field unit personnel who will fill key ICS positions, such as Planning Section Chief, in place of attending an ICS Position-Specific course. They will be conducted by NSF Strike Teams with the assistance Of instructors from other agencies and perhaps commercial sources. It is envisioned that at least one workshop will be given annually in each Strike Team area of responsibility.
- f I-400. This block of instruction is geared toward senior management level personnel. Field unit Commanding Officers, Executive Officers, and Port Operations Department Chiefs should attend this course. Additionally, members who would staff an Incident Area Command during a Spill of National Significance, including Incident Area Commanders, should attend I-400 training in addition to I-100-300 and ICS Area Command. Currently it is available on a limited basis from NIFC or the California Department of Forestry. Later it will be available at RTC Yorktown in senior-level courses such as the OSC Crisis Management Course and the Chief, Port Operations Department Course.
- g Sub-Team Training. This training will build upon the existing work accomplished in the Multi-Agency Team Building Enhancement System (MATES) developed by the CG Research and Development (R&D) Center and managed by G- MOR-2. Currently, units will receive MATES training prior

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to a PREP exercise. Beyond the sessions held in conjunction with the PREP program, other limited MATES opportunities will be available; however, District (m) offices are encouraged to pursue other available team-building opportunities for their field units.

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## **Training Table**

T1-1	MILE D	=	
Training	Who Receives It	How it is Provided	Estimated Time Frame*
l - 100	Everyone	Correspondence Course	Within first year
I - 200	Field Units, ISTs, IMTs	Strike Team 1-day course	Within first year
		Core Curriculum of Marine Safety Courses & Facilitated correspondence course	By end of first year
I - 300	Field Unit Leadership Roles, Ops. Sect. Task Force & above, Other Sects. Unit Leader & above, IMTs	National Strike Force, Commercial Sources	Within first year .
		CPOD Course, Contingency Preparedness Courses	Within second year
I - 400	Field Unit COs, XOs, Port Ops., Area Cmd. Staff	NIFC, Calif. Dept. of Forestry, OSC Crisis Mngmnt. Course, Port Ops Dept Course	By end of third year
Position Specific Workshops	Field Unit Key Positions	National Strike Force w/outside agency help	Within second year
Position Specific Courses	IMTs	NIFC, Calif. Dept. of Forestry	By end of third year

\*Note: Time frame starts with the promulgation date of this instruction.

### \* 6 ICS Qualification System.

The NIIMS ICS qualification system is a "performance based" system. In this type of system, the primary criteria for qualification is individual performance as observed by an evaluator using approved standards. This differs from a "training based" system, which uses the completion of training courses or a passing score on an examination as the

primary criteria for qualification. Specifics of the qualification system will be addressed separately in Appendix

F In short, the components of the qualification system are:

- a Position Task Books (PTBs). These contain all critical tasks required to perform a specific job and are similar to PQS books. PTBs appropriate for Coast Guard use will be developed. There will be a PTB for the majority of ICS positions including support teams for ICS positions. Performance tasks may be "signed off" after performance during real incidents, simulated incidents (drills and exercises) or planned events.
- b Training Courses and Job Aids. These provide the specific skills and knowledge required to perform tasks as prescribed in the PTB. Training courses have been explained above. Job Aids specific to Coast Guard operations are being developed by the National Strike Force for various ICS positions.
- c Agency Certification. Once personnel have completed the required training courses and job aids, and have completed the appropriate PTB, their Commanding Officer will issue a certification letter. The person will be assigned a qualification code which will be entered into a database and tracked. The National Strike Force Coordination Center (NSFCC) will track qualifications of personnel assigned to an IMT. District staffs will manage lists of qualifications for unit personnel within their respective jurisdictions.
- d Interim Qualifications. It will take some time before the ICS qualification system is established and operational. In the interim, Commanding Officers are to determine field unit personnel "qualified" to hold ICS positions based on training and past response experience.
- e Instructor Qualifications. Throughout the ICS Training Program implementation, it will be necessary to groom instructors from various units to be ICS instructors within the training community. Until final selection guidance is promulgated, instructors should be identified using the following criteria: (1) have been trained one level above the course they intend to teach; (2) have an interest in becoming an instructor; (3) have received formal instructor training or have significant teaching experience; (4) have experience with the use of ICS; and (5) have received a recommendation from their command to be an instructor.

- 7 Other Key Elements of ICS Implementation. In addition to providing the ICS training as outlined above, there are other key steps that must be taken to ensure successful implementation of ICS.
  - a Analyze and Re-analyze the Training Process. The Coast Guard ICS training program will be analyzed to ensure the program is effective and as cost-efficient as possible. Presently, a Front End Analysis is underway for the ICS training program. This analysis is intended to Formally determine the ICS training requirements for the Coast Guard. It will focus on who should be trained to what level, how the various elements should be delivered in order to be effective and most cost-efficient, and methods to determine if the ICS training program is effective. During and after this analysis, appropriate changes and improvements to the ICS training program will be made.
  - b Identification of ICS Performance Standards. As with any training program, there must be standards set which can be used to measure the effectiveness of the training program. Coast Guard specific performance standards for the ICS positions will be identified by Commandant as part of the ICS training implementation process.
  - c Establish an Independent Evaluation Board. This will be a standing board consisting of ICS experts inside and outside of the Coast Guard to evaluate ICS performance during real incidents or exercises. Such evaluations will provide critical feedback to the program manager and will identify areas of weakness that can be rectified with adjustments in the training program.

#### CHAPTER 2. RESPONSIBILITIES

#### 1 <u>Unit Responsibilities</u>.

Listed below are responsibilities for each unit that is expected to participate in the implementation of NIIMS ICS - National Training Curriculum:

#### a Commandant (G-MOR)

- (1) Formulate national response management policy consistent with the National Contingency Plan.
- (2) Coordinate NRT doctrine.
- (3) Establish and coordinate activities of the ICS Implementation Team.
- (4) Provide representative(s) for the ICS Implementation Team.

#### b National Strike Force

- (1) Develop subject matter experts in ICS.
- (2) Provide representative(s) for ICS ImplementationTeam.
- (3) Provide qualified personnel, as needed, to serve asICS instructors.
- (4) Provide qualified personnel to serve in various ICS roles, including ICS Technical Specialists or advisors, during actual incidents, as a part of NSF Incident Management Team Support.
- (5) Provide qualified personnel to serve as members of IMTs as appropriate.
- (6) Provide ICS I-200 training as part of the NSF Marine Safety Office Training Program.
- (7) Develop and provide I-300 course and position specific workshops for marine safety Field units/personnel.

- (8) Develop ICS qualification standards and coordinate the documentation/tracking of ICS instructor qualifications.
- (9) Work with Area Commanders to develop procedures for selection and administration of IMTs.
- (10) Assist Marine Safety Offices and Captains of the Port to develop port-specific ICS organization for Type 3/4 incidents, including the identification of personnel to fill the ICS positions; and determine personnel who, based on this planning, require intermediate level (I-300) ICS training.
- (11) Remain abreast of commercial or other sources of ICS training. Assist units in locating additional ICS training.
- (12) Assist District (m) offices with identifying ICS team training opportunities.
- (13) Develop appropriate ICS job aids.
- (14) Provide representation on the NIIMS NWCG.
- (15) Document training received by NSF personnel for IMT formation.

#### c Commandant (G-WTT)

- (1) Incorporate NIIMS ICS National Training Curriculum into appropriate existing resident training within the next 2 years.
- (2) Develop subject matter experts.
- (3) Conduct Front End Analysis for Coast Guard ICS Training Program. RTC Yorktown
- (1) Provide representative(s) for ICS Implementation Team.
- (2) Serve as the key advisor to the ICS Implementation Team on instructor qualifications and standards.

#### **Coast Guard Institute**

- (1) Administer correspondence course for personnel using "Module 1- ICS Orientation" as the student text.
- (2) Manage distribution of NIIMS ICS Module 1- ICS Orientation.
- (3) Management of publications essential to the support of ICS.

#### d Research & Development Center

- (1) Provide representative(s) for ICS Implementation Team.
- (2) Serve as the key advisor to the ICS Implementation Team on MATES Sub-Team Training.
- (3) Monitor, adapt, and develop as necessary, supporting technology beneficial to response management.

#### e Areas

- (1) Seek NIIMS ICS National Training Curriculum opportunities.
- (2) Provide qualified personnel to serve on IMTs.
- (3) Work with the NSF to develop procedures for selection of personnel for IMTs.
- (4) Provide oversight and administration of IMTs.

#### f Districts

- (1) Coordinate District ICS Training Program and identify ICS training opportunities.
- (2) Work with district field units and regional Strike Team to identify qualified personnel for membership on IMTs.
- (3) Coordinate all ICS related district activities. (i.e. Area Committees, RRT implementation, Liaison with other agencies

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(4) As ICS is implemented, establish and maintain a list of district personnel, both active duty and reserve, with ICS qualifications for Unit Leader, Section Chief, or Command Staff Officer and for Incident Support Team positions.

## g Groups/Marine Safety Offices/Activities

- (1) Develop subject matter experts on ICS.
- (2) Ensure I-100 correspondence course is completed by all unit members.
- (3) Ensure ICS training is documented in unit members' service records as a page 7 entry as well as in the members' individual training records.
- (4) Provide, as practical, qualified personnel to serve on District ICS Training Team(s).
- (5) Provide, as practical, qualified personnel to serve on ISTs.
- (6) Coordinate unit ICS Training Program and identify ICS training opportunities within Area Committee and local community.
- (7) Develop port specific ICS organization, identify personnel to fill the required ICS positions, and determine intermediate/advanced ICS level training needs.
- (8) Coordinate implementation of NIIMS ICS National Training Curriculum into the Area Committee process and ACP (Annex B).
- (9) Ensure that all Reserve personnel are ICS trained to appropriate level that they will be expected to support during response operations.

# Appendix A Incident Type and Characteristics COMDTINST 16471.2

Incident Complexity	Incident and Organization Characteristics
Type 4 Initial Response	<ul> <li>Small incident (approx.80% of spills) or initial response to larger incident</li> <li>Typically one operational period. Verbal action plan.</li> <li>Single or a few resources.</li> <li>Command, General Staff positions normally not activated.</li> </ul>
Type 3 Extended Response	<ul> <li>Larger incident (approx. 15% of spills), e.g. vsl collision/fire requiring significant response efforts, of serious potential, resolved fairly quickly.</li> <li>May require multiple operational periods if so, written action plan.</li> <li>Several single resources to several strike team/task forces.</li> <li>Some Command and General Staff activated; usually no Division/Group Supervisors (unless required by span-of-control considerations). May use a staging area.</li> </ul>
Type 2	<ul> <li>Regionally significant incident (&lt;5% of spills).</li> <li>Multiple operational periods. Written action plan.</li> <li>Many resources, combined as task forces/strike teams. As many as 200 persons on the front line, up to 500 overall.</li> <li>Most/all Command &amp; General Staff, and many functional unit positions activated.</li> <li>Examples: T/B NORTH CAPE (RI), T/B BUFFALO barge spills (TX), Powell Duffryn (GA), T/VANITRA (PA)</li> </ul>
Type 1	<ul> <li>Nationally significant incident (&lt;1% of spills).</li> <li>Multiple operational periods. Written action plan.</li> <li>Numerous resources, extensive field ops. Hundreds, perhaps thousands of persons on front line, many more in support roles.</li> <li>Command &amp; General Staff, and functional unit positions activated.</li> <li>Examples: San Jacinto River flood (TX), T/B MORRIS BERMAN (PR), T/V EXXON VALDEZ (AK), T/V MEGA BORG (TX), TWA 800</li> </ul>

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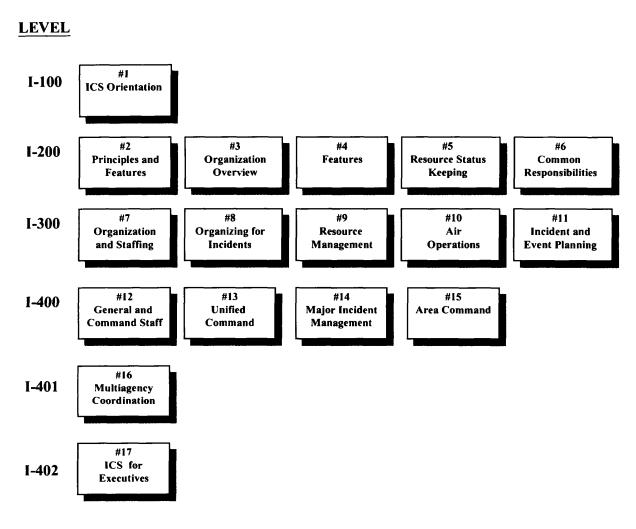
# ICS Incident Management Team Structure

	Personnel Requirements
Command and General Staff Deputy Incident Commander, Liaison, Information, Safety, Planning, Logistics, Finance, and Operations	8
Operations Air Operations, Deputy Operations	2
Planning Documentation, Demobilization, Resource Unit Leader (RUL), Situation Unit Leader (SUL)	4
Finance/Administration Time/Cost Unit Leader, Procurement Unit Leader	2
Logistics Communications, Supply	2
Technical Specialists ICS	1
Total IMT = 19	

## **ICS Incident Support Teams**

This appendix is to be developed and will cover the roles and responsibilites of Incident Support Team Members.

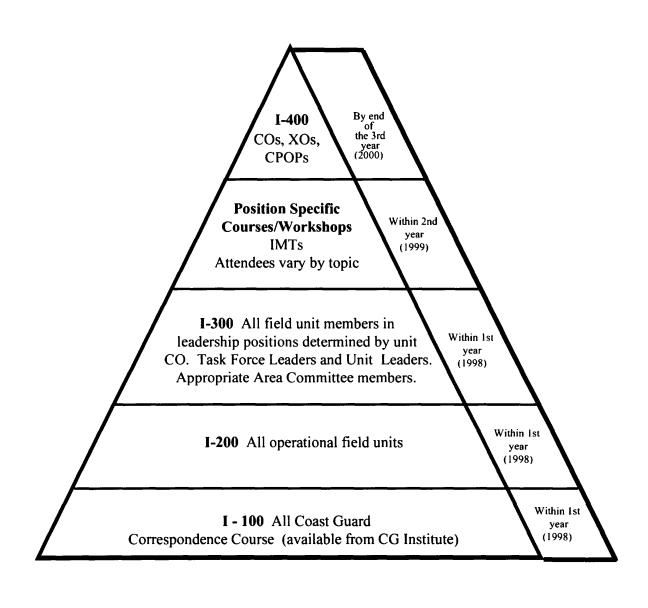
## Incident Command System National Training Curriculum Series



## **Companion Documents**

Appendix E COMDTINST 16471.2

## **ICS Training Diagram**



This appendix is to be developed.